

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
(CAMDEN VICINAGE)**

**WEISBERG LAW, P.C.**  
MATTHEW B. WEISBERG  
7 SOUTH MORTON AVE.  
MORTON, PA 19070  
610-690-0801

Daniel Donnelly  
39 Churchtown Road  
Pennsville, NJ 08070

Plaintiffs,

v.

Daniel Guerriero  
1412 Oxford Valley Road  
Levittown, PA 19056

Elenor Guerriero  
1412 Oxford Valley Road  
Levittown, PA 19056

Steve Ruffo individually  
and d/b/a DES Title Agency, Inc.  
4905 Hamilton Drive  
Voorhees, NJ 08043

DES Title Agency, Inc.  
c/o Steve Ruffo  
4905 Hamilton Drive  
Voorhees, NJ 08043

Default Express Services, Inc.  
4905 Hamilton Drive  
Voorhees, NJ 08043

Joseph Semptimphelter individually  
and d/b/a JTS Asset Group  
11 Winterset Lane  
Marlton, NJ 08053

Sharon Summers Keller, individually  
and d/b/a MidAtlantic Capital  
2294 Staffordshire Road

CIVIL ACTION NO.: 10-3240

**AFFIDAVIT OF MERIT**

Furlong, PA 18925 :  
:  
Samantha Associates, Inc. :  
225 Lincoln Highway :  
Fairless Hills, PA 19030 :  
:  
Richard W. Hoy Associates, P.C. :  
1518 Walnut St., Ste. 1600 :  
Philadelphia, PA 19102 :  
:  
David K. Lehman, Esquire :  
1518 Walnut St., Ste. 1600 :  
Philadelphia, PA 19102 :  
:  
Bank of America, N.A. :  
401 N. Tryon St. :  
Charlotte, NC 28255 :  
:  
JOHN DOE 1 :  
Defendants. :

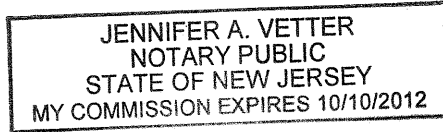
I, Charles N. Riley, Esq., having been duly sworn, say:

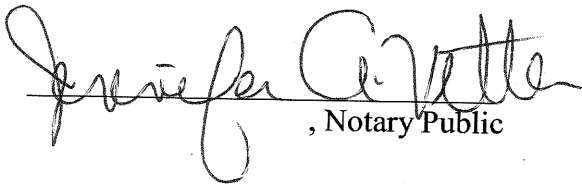
1. I am an attorney at law in the State of New Jersey and was admitted to the bar in 1973.
2. I have substantial expertise in the area of residential mortgage foreclosure rescue schemes and residential real estate transactions .
3. I have reviewed the Second Amended Complaint, and power of attorney concerning the residential real estate transaction involving plaintiff, and defendants Daniel & Eleanor Guerriero for the home at 39 Churchtown Road, Pennsville, NJ 08070.
4. There exists a reasonable probability that the skill and knowledge exercised by the defendants Richard W. Hoy Associates, P.C. and David K. Lehman, Esquire in this residential real estate transaction fell outside acceptable professional standards.

  
CHARLES N. RILEY, ESQUIRE

Subscribed to and sworn  
before me this 25th day

of October 2010.



  
, Notary Public